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November 5, 2010

Forrest Cole
Forest Supervisor
Tongass National Forest
648 Mission St.
Ketchikan, AK 99901

Dear Mr. Cole:

The Nature Conservancy would like to express its support for the over-arching goals of the Forest Service's proposed Transition Framework on the Tongass National Forest. We perceive exciting opportunities for collaborative efforts to provide economic opportunity and jobs to local residents, sustain a timber industry, and transition from timber harvesting in roadless areas and old-growth forests to long-term stewardship contracts and young growth management. We intend to work with the Forest Service, local communities, and Tongass stakeholders to seek to implement this transition in a way that conserves wild salmon watersheds, biodiversity, and wildlife habitat, while sustaining the overall health and productivity of the forest ecosystem and the communities that depend on the Tongass.

TNC would also like to commend you and your staff on the development of the draft Five Year Vegetative Management Plan and Schedule. We believe that this plan provides a solid initial basis for transitioning the Tongass National Forest and its associated economies from management keyed to old growth timber harvest to young growth timber management, integrated resource management opportunities, and the restoration of wildlife habitat and salmon streams. We appreciate that the schedule has a variety of projects designed to address the needs of multiple resources and provide a range of forest products and economic opportunities. We have reviewed the draft schedule and would like to provide some project specific input, as requested at the recent meeting of the Tongass Futures Roundtable, to assist you and your staff in developing a final plan.

The Conservancy is very supportive of an Integrated Resource Management Planning (IRMP) process that occurs in a collaborative manner with strong community engagement. We have joined others in taking a lead role in integrated, collaborative watershed planning and we believe that such efforts increase the likelihood of successful project implementation, especially in sensitive areas such as Staney Creek, Central Kupreanof, NW Kupreanof, Kuiu, and perhaps even Wrangell Island. Indeed, early collaborative engagement, plus thoughtful deliberation throughout the environmental analysis (NEPA) process, will help resolve questions about how the projects in the vegetative management schedule will be implemented. The success of the transition will also depend, to a significant extent, upon how the individual projects reflect the

overall vision of the 5-year schedule. TNC is committed to working on the details of the components of this schedule as they go through the implementation process.

As you know, the Conservancy helped organize and participated in the Staney Community Forestry Project, and we support the inclusion of Staney projects in the 5 Year plan in the Wildlife Habitat Integrated Resource Service Contract Schedule and the Watershed Restoration Schedule. We urge the Tongass National Forest to prioritize implementation of the Staney IRMP, and develop a suite of projects that reflect the desired future conditions that the Staney Collaborative Group identified. This will require work and creativity. We believe that these desired conditions are realistic and attainable and we will assist in making this happen.

Several VCUs in the 5-year schedule may include some timber harvest in more sensitive areas (see below). The Conservancy will accept additional scheduled harvesting outside of the roaded base and low conflict areas in the areas below, while acknowledging that the success and public acceptance of such efforts will be greatly enhanced by early, collaborative, stakeholder engagement.

- 1) Big Thorne - outside of the roaded base and within specific Fish and Wildlife VCUs included in the Tongass Solutions Concept/September 2009 ("Solutions") (large sale in 5760 – off of existing road, 5960 – South of the Thorne Bay/Coffman road, 5971 – off of existing roads, and small sales with partial harvest considerations in 5780).
- 2) Central Kupreanof - on the roaded base and within the specific Solutions Fish and Wildlife VCU 4290.
- 3) Wrangell - harvest outside of the roaded base and in the Solutions Timber Management areas.

The Conservancy does not support harvest in these more sensitive and controversial watersheds:

- 1) VCU 5820 and within Honker Divide (5740, 5750) in the Big Thorne project,
- 2) VCUs 4360, 4380, 4400 in Central Kupreanof,
- 3) VCU 4790 in the Wrangell project,
- 4) VCUs 4670 and 4680 in the Navy project, and
- 5) Sensitive areas in VCU 4210 and VCU 4000 in any Kuiu project, where the focus should be on restoration.

The Forest Service is making an important step in developing a draft vegetation management schedule to initiate this historic transition. Thank you for all of your hard work.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Norman A. Cohen".

Norman A. Cohen
Southeast Alaska Program Director